

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORIES
(NAA/USPS-T4-1-3)
(January 25, 2012)**

The United States Postal Service provides the responses of witness Neri (USPS-T-4) to the above-listed interrogatories of the Newspaper Association of America, dated January 11, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORY

NAA/USPS-T4-1: Please refer to page 3 of your testimony, lines 2 through 8. At which categories of the mail processing facilities listed there may Periodicals mailers obtain a destination entry discount? What discount(s) would be available?

RESPONSE:

Periodicals may be pre-sorted and labeled based on the instructions identified in the Postal Explorer (formerly Domestic Mail Manual) for destination entry discount. Facilities that qualify for Periodical destination entry discount are identified in the mail direction file via FAST.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORY

NAA/USPS-T4-2: Assuming that the mail processing network is rationalized as generally described by the Postal Service in this proceeding and service standards for First-Class and Periodicals Mail are revised as proposed, please explain whether those changes would have any effect on processing of Standard Mail flats on FSS equipment. In particular, would you expect a larger proportion, a smaller proportion, or no change in the proportion of Standard Mail flats to receive FSS processing?

RESPONSE:

Please see my response to TI-USPS-T4-1.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORY

NAA/USPS-T4-3: Does your answer to NAA/USPS-T4-2 vary depending upon whether the Standard flats mailing is entered at:

- a. A destination delivery unit?
- b. A facility at which it can receive an SCF discount?
- c. A facility at which it receives no dropship discount?

RESPONSE:

It is expected that Standard Mail Flats will continue to be processed on FSS as they are today - according to arrival time, expected day of delivery, processing capability, and presence within a FSS candidate zone.